

1 was an obligation here that arose from an initial provision of
2 funds and that there was some expectation of repayment at some
3 point?

4 A That's never been voiced. The only thing that's --
5 that I've ever heard voiced about any indebtedness or any
6 loans would be let's look at how well these different
7 corporations are, are, are doing. Are they able to meet
8 their, their, their expenses?

9 Q Now, at the time Trinity Broadcasting of Oklahoma
10 City was formed in 1977, did you consider Trinity Broadcasting
11 of Oklahoma City to be an affiliated company of Trinity
12 Broadcasting Network?

13 A Yes.

14 Q Did you consider it to be an owned and operated
15 company of Trinity Broadcasting Network?

16 A I, I can't recall. I don't believe that that went
17 through my mind. I considered it as an affiliate because it
18 was going to program -- broadcast Trinity programs.

19 Q Has there, has there been a time subsequently that
20 you have now considered -- that you -- Do you now consider
21 Trinity Broadcasting of Oklahoma City to be an owned and
22 operated company?

23 A At the present time, we have all the board members
24 of Trinity Broadcasting Network on that board, along with Al
25 Benefield. So that would be owned and operated.

1 Q So there did come a time when Trinity Broadcasting
2 of Oklahoma City became an owned and operated company?

3 A Yes.

4 Q But it wasn't in the beginning?

5 A Not in my mind. I didn't think of it as such.

6 Q But you did think Arizona was an owned and operated
7 company from the beginning?

8 A Yes.

9 Q Can you give us some distinction or can you provide
10 us with some explanation as to why Arizona would have been and
11 Oklahoma City would not have been an owned and operated
12 company from the beginning?

13 A Only in my own mind. But I was very directly
14 involved in, in Arizona and really had virtually nothing to do
15 with Oklahoma City. So, frankly, I gave very little thought
16 to, to Oklahoma City when that came aboard.

17 Q But there was a time fairly early on when you became
18 a director of Oklahoma City, correct?

19 A I said I can't recall when that was.

20 Q You've been a director of Oklahoma City for 10 years
21 now?

22 A I would say so.

23 Q Trinity Broadcasting of Oklahoma City has its own
24 employees?

25 A Yes.

1 Q Those are the persons who work at the station?

2 A That would be true.

3 Q Your answers would be the same as for the Arizona
4 questions that I put to you in terms of insurance plans and
5 retirement plans? That is, whether the persons at the
6 Oklahoma City station have their own insurance and retirement
7 plans or whether they're network plans.

8 A The, the only retirement plan -- Let me make this
9 clear. The only retirement plan that Trinity corporations
10 have is called a 4031P plan where the, the -- it's, it's
11 applicable just to nonprofits, where an employee is able to
12 contribute a certain amount of his earnings and they are
13 matched by the corporation. So that, that would be a plan
14 whereby the, the earnings would be matched by Trinity of
15 Oklahoma.

16 Q Now, what happened to Al Brown's situation when he
17 changed from station manager of Trinity Broadcasting of
18 Oklahoma City station to work at the network?

19 A He became an employee of Trinity Broadcasting
20 Network.

21 Q What happened with respect to his insurance and
22 retirement plans?

23 A I don't know that he had one. It was my
24 understanding that those plans are, are transferrable, though.

25 Q But if a person went from Oklahoma City to the

1 network, would that be a transfer or would that be a
2 retirement and a rehire?

3 A That would be a, a resignation and a rehire.

4 Q Now, Trinity Broadcasting of Florida was a Florida
5 corporation, correct, not a California corporation?

6 A That's correct.

7 Q And you and Paul Crouch were directors of Trinity
8 Broadcasting of Florida from its inception?

9 A That's right.

10 Q Now, Trinity Broadcasting of Florida was formed at a
11 time when Jane Duff was a member of the board of Trinity
12 Broadcasting Network, correct?

13 A That's right.

14 Q When Trinity Broadcasting of Florida was organized,
15 do you recall that its name was Trinity Broadcasting Network
16 of Florida, Inc.?

17 A I vaguely recall that.

18 Q And do you also recall that the initial directors
19 were yourself, Paul Crouch and Terry Hickey?

20 A I don't recall that.

21 MR. SHOOK: Your Honor, I'll locate that later.

22 JUDGE CHACHKIN: Yeah, we can assume that for
23 purposes of the question, unless Mr. Topel disagrees, but in
24 the absence of any disagreement, we can assume it. Go ahead.

25 BY MR. SHOOK:

1 Q Now, how did it come about -- Assume for the
2 purposes of my question that Terry Hickey was an original
3 director of Trinity Broadcasting Network of Florida. How did
4 it come about that Mr. Hickey was replaced by Jane Duff?

5 A I think that Mr. Hickey was put on that board as a
6 matter of convenience for organizational purposes and, and it
7 was the intent all along to eventually replace him and put
8 someone else on the board.

9 Q And that someone else was Jane Duff?

10 A That's correct.

11 Q And how did it come about that a person by the name
12 of Bernard Ridings became a director of Trinity Broadcasting
13 of Florida?

14 A He was a, he was a station manager in the early
15 days. He lived in Florida.

16 Q And how did it come about that Janice Crouch became
17 a member of Trinity Broadcasting of Florida?

18 A I just know that she was voted on and the, the
19 concept in my mind was that she was deeply involved in the
20 Trinity corporations and deserved to be on the board.

21 JUDGE CHACHKIN: Did Dr. Crouch propose her as a
22 board member?

23 MR. JUGGERT: I believe he did.

24 BY MR. SHOOK:

25 Q Was the primary goal of Trinity Broadcasting of

1 Florida to provide an outlet for Trinity Broadcasting Network
2 programming in the Miami area?

3 A That was one of the goals.

4 Q The other goal, as you have said, to provide local
5 programming and then to have some of that local programming be
6 made available to other members of the network?

7 A Yes.

8 MR. SHOOK: Now, Howard, for purposes of this, I
9 would like you to place in front of the witness Trinity
10 Broadcasting of Florida Exhibit 36, Tab B. Your Honor, can we
11 go off the record?

12 JUDGE CHACHKIN: Yes.

13 (Off the record.)

14 JUDGE CHACHKIN: Back on the record. The witness
15 has the material?

16 MR. JUGGERT: Yes, I do. Thank you.

17 BY MR. SHOOK:

18 Q Now, with respect to the first page, where it says
19 "Bylaws of Trinity Broadcasting of Florida, Inc.," were these
20 the original bylaws of the corporation or were these bylaws
21 amended at some point?

22 A I believe these were amended. I don't believe these
23 were original.

24 Q And by amended, would it be correct that the purpose
25 of the amendment was to write in the protection for Paul

1 Crouch as president?

2 A That's, that's, that's correct. As I recall, I
3 think on the Florida corporation we also included some tenets
4 of faith that weren't in the original ones.

5 Q By that, are you referring to the Rights of
6 Ordination that appear on pages 14 and 15?

7 A Well, I thought there was a -- At the beginning of
8 the bylaws, I thought there was a -- in my mind there was a
9 statement that certain tenets of faith had become a part of
10 those.

11 Q And Part 2, Membership, Section 1, Qualifications,
12 is that what you're referring to?

13 A No. It was more blatant than that.

14 Q Now, I'd like to direct your attention to page 15.
15 As you can see, the copy that we have in this exhibit is
16 unsigned and undated.

17 A Yes.

18 Q Are you aware of the signed and dated version of
19 these bylaws?

20 A Yes, I am. It was provided to me within, I would
21 say, the past couple of weeks.

22 Q All right, I'm not understanding your answer.

23 A The, the -- This was the only copy that I had, that
24 I produced, and the -- there was an attorney in Florida that,
25 that we were able to track down that had a copy of some signed

1 | bylaws. I think I just provided those to Mr. Topel.

2 | MR. TOPEL: This is in the process of producing the
3 | stipulation that we've agreed to provide. We're trying to
4 | round up all those bylaws from the various states.

5 | MR. JUGGERT: Florida's had about three attorneys,
6 | and so we, we had some difficulty locating them.

7 | BY MR. SHOOK:

8 | Q Very good. With respect to an earlier question that
9 | I had of you concerning the Articles of Incorporation of
10 | Trinity Broadcasting Network of Florida, I've now found them.
11 | They happen to be in the same exhibit that, that you have in
12 | front of you, Exhibit 36, except they're in Tab A and they
13 | begin on page 4. And what I had wanted to direct your
14 | attention to was the list of directors that appears on page 8.

15 | A Yes.

16 | Q And you'll see that it's yourself, Paul Crouch, and
17 | Terry Hickey.

18 | A Yes.

19 | Q The listing of Mr. Hickey there was -- did you say
20 | it was a matter of convenience and that there was always a --
21 | the intention of using someone else other than Mr. Hickey?

22 | A Yes, that's generally why you put -- the only reason
23 | you'd put directors in the, in the articles. If you'll look
24 | at the -- Normally, it's the, the incorporators who elect the
25 | first directors unless you specify in your articles who the

1 first directors are going to be. These incorporators were all
2 Floridians. I think they're all out of the law firm that
3 incorporated this and --

4 Q You're referring to the list of persons on page 7
5 who are the -- identified as the subscribers?

6 A Well, yes. Those would be the incorporators. And
7 so we named the first directors here so that the, the
8 directors could be elected in California.

9 Q Now, did you draft the Form 1023 to obtain tax
10 exempt status for Trinity Broadcasting of Florida?

11 A I can't recall. Is there a copy of it here?
12 (Pause) I think that I had input in it. We used a Florida
13 attorney to, to handle the exemption application and the
14 incorporation.

15 MR. SHOOK: All right, at this time, Your Honor, I'd
16 like to mark for identification as Mass Media Exhibit 416 the
17 Application for Recognition of Exemption Form 1023 that was
18 produced to us during the course of discovery as Trinity
19 Broadcasting of Florida's.

20 JUDGE CHACKIN: The document described will be so
21 marked.

22 (Whereupon, the document referred
23 to as Mass Media Exhibit No. 416
24 was marked for identification.)

25 MR. COHEN: What, what's the number, Your Honor?

1 JUDGE CHACHKIN: 416.

2 MR. COHEN: Thank you.

3 BY MR. SHOOK:

4 Q I'd first like to direct your attention, Mr. Juggert,
5 to Part 3, Question 1, which appears on the first page. And
6 did you have any input in the response given to this question?

7 A I can't recall. No, I don't recall that.

8 Q Do you know whether any reference was made to prior
9 Form 1023's that had been filled out Trinity-named companies
10 in preparing this response?

11 A I, I don't, don't recall that.

12 Q I like you to refer to Question 2 of Part 3. Did you
13 have any input in that answer?

14 A That doesn't sound like my wording.

15 Q Turning to the second page, did you have any, any
16 input in -- with respect to the response given to Part 3,
17 Question 3?

18 A I probably had input on it, but it's not my, my
19 wording.

20 Q Moving on to Number 4, where it references "See
21 Attachment A," if you would turn to Attachment A, which are
22 the last three pages, you'll see that there is a listing of
23 officers and directors.

24 A Yeah.

25 Q It has Rev. Paul Crouch as an officer and director,

1 | yourself as an officer and director, Terrence Hickey as an
2 | officer, Pearl Jane Duff as an officer and director, and
3 | Ralph James Duff as an officer. Do you see that?

4 | A Yes, I do.

5 | Q Now, did you have any input or involvement in the
6 | preparation of Attachment A?

7 | A I'm pretty sure that I provided this information to
8 | the attorney in, in Florida.

9 | Q So apparently, between the time of the incorporation
10 | of Trinity Broadcasting of Florida and the preparation of this
11 | document, Mr. Hickey was no longer a director and Mrs. Duff
12 | was a director.

13 | A Either that or, or we were letting the IRS know who
14 | -- the real directors to be.

15 | Q Now, turning to the third page, Part 3, Question 5,
16 | did you have any involvement in the preparation of the
17 | response, responses given to the questions that are noted for
18 | Part 3, Question 5?

19 | A I believe that I did. It's a technical question.

20 | Q And you answered no because -- you answered no to the
21 | question, "Does this -- does the organization control or is it
22 | controlled by any other organization?" You answered no to
23 | that question because there were no enforceable agreements
24 | between Trinity Broadcasting Network and Trinity Broadcasting
25 | of Florida relative to the board of directors and the

1 operation of the board?

2 A Yes, and because the second part of that question was
3 more applicable that we answered yes to.

4 MR. SHOOK: Your Honor, at this time I would move
5 into evidence Mass Media Exhibits 415 and 416.

6 JUDGE CHACHKIN: Any objections?

7 MR. TOPEL: No, sir.

8 JUDGE CHACHKIN: Mass Media Bureau Exhibits 415 and
9 416 are received.

10 (Whereupon, the documents referred
11 to as Mass Media Exhibits 415 and
12 416 were received into evidence.)

13 BY MR. SHOOK:

14 Q To pay for the Trinity Broadcasting of Florida
15 station in Miami, did Trinity Broadcasting Network loan
16 Trinity Broadcasting of Florida the necessary funds?

17 A Trinity made the funds available. I don't recall it
18 ever being characterized as a loan.

19 Q So in other words, there was no note or security
20 agreement relative to the provision of funds from the network
21 to Florida?

22 A No.

23 Q And you don't have any, you don't have any
24 recollection now as to how Trinity Broadcasting Network
25 reflected those monies in their books in terms of whether it

1 was a loan or a gift or whatever it was?

2 A No, I don't.

3 Q Now, I'd like you to turn to Mass Media Exhibit
4 Number 3.

5 JUDGE CHACHKIN: That's the first part.

6 BY MR. SHOOK:

7 Q If you'll notice on the first page, there is the
8 column for Trinity Broadcasting of Florida.

9 A Yes.

10 Q And I was wondering if, if -- nd if you look under
11 the "Liabilities and Fund Balance" whether this would jog your
12 memory at all in terms of what arrangements or understandings
13 there may have been between the network and Florida relative
14 to the provision of any funds.

15 A No, it doesn't. I'm blank. Because it says, "Notes,
16 contracts and mortgage payable."

17 Q I'm just asking whether this helps your memory at
18 all.

19 A No. I think that's just a category that they put
20 that obligation into.

21 Q Now, you were a director of Trinity Broadcasting of
22 Florida from the beginning, correct?

23 A Yes.

24 Q Do you have any recollection of what, if any, notes
25 or contracts Trinity Broadcasting of Florida was involved with

1 in order to have -- apparently, it looks like \$3,600,000
2 obligation of some kind?

3 A I believe that that pertains to -- You're jogging my
4 memory. When we purchased that station, there was a mobile
5 home park that surrounded it, and we entered into a, a
6 contract to buy the mobile home park and to buy an easement to
7 give us right of way to the station. So that, that, that
8 undoubtedly reflects that debt, to pay for the mobile home
9 park.

10 Q So that was an obligation of Trinity Broadcasting of
11 Florida to whoever it was --

12 A Holiday RV Parks.

13 Q Now, in order to come up with that money in the first
14 place, though, didn't that money initially come from the
15 network?

16 A I believe that there was just a, a small down payment
17 and the rest of it was a secured note. It was secured by the
18 stock in Holiday RV Parks.

19 Q Now, with respect to the down payment, where did the
20 down payment come from?

21 A That would have come from Trinity Broadcasting.

22 Q The network?

23 A Well, I -- Again, let me back track. I'm not sure.
24 It may have been -- When we bought that -- negotiated for that
25 RV park, we may have -- Trinity of Florida may have had its

1 own funds at that time. I'm not sure where the down payment
2 came from.

3 Q Well, wasn't it the case that Trinity of Florida
4 didn't actually have any of its own funds until it began to
5 program and --

6 A That's, that's true.

7 Q So that the only funds that Trinity Broadcasting of
8 Florida could have had in the beginning would have been those
9 provided by the network?

10 A Before it began its programming, that's true.

11 Q Now, you've always been a board member of Trinity of
12 Florida, correct?

13 A Yes.

14 Q At the time Trinity of Florida was formed in 1979,
15 did you consider Trinity of Florida to be an affiliated
16 company of Trinity Broadcasting Network?

17 A Yes.

18 Q Did you consider it to be an owned and operated
19 company of Trinity Broadcasting Network?

20 A Yes, I did.

21 Q Has there ever been a time when you did not consider
22 Trinity Broadcasting of Florida to be an owned and operated
23 company of the network?

24 A No.

25 Q Now, that's without regard to whether the boards of

1 Trinity Broadcasting network and Trinity of Florida were
2 identical.

3 A That's true.

4 Q Perhaps an analogy would be useful here, and I'm
5 going to characterize how I would view this and if you
6 disagree with my characterization, please say so and give it
7 whatever characterization you deem appropriate. I think of
8 Trinity Broadcasting Network as the head and Trinity of
9 Arizona, Trinity of Oklahoma City, Trinity of Florida would be
10 like body parts.

11 A Well, that analogy doesn't follow through because
12 body parts have different functions. The -- all of these
13 corporations are, are engaged in the -- generally, the same
14 purposes. All of them broadcast Christian programming, all of
15 them do programming, all of them have a, an outreach call
16 because they have extended to the poor and to the needy. And
17 so I would say it's more to me like a group of, of -- allies.

18 JUDGE CHACHKIN: Maybe siblings.

19 MR. JUGGERT: Siblings.

20 BY MR. SHOOK:

21 Q Not exactly twins, but brothers and sisters.

22 A Yeah.

23 MR. COHEN: Boy, this is so poetic, Your Honor.

24 JUDGE CHACHKIN: We've just begun.

25 BY MR. SHOOK:

1 Q Trinity Broadcasting of Florida has its own
2 employees, correct?

3 A That's correct.

4 Q And those are the persons who work at station WHFT-
5 Miami?

6 A I lose track of those --

7 Q Whatever the call sign is.

8 A -- call signs.

9 Q All right, those are the persons who work at the
10 Miami station?

11 A Yes.

12 Q And again, with respect to their insurance and
13 retirement plans, those are the plans of the network but there
14 is some --

15 A Well, it has to come from there, that nonprofit
16 corporation. That nonprofit corporation, Trinity of Florida,
17 has to match their salary. So it has to come through that
18 corporation.

19 Q Now, I'm not saying it happened in this case, but
20 this is more theoretical. If a person left Trinity
21 Broadcasting of Florida to work at Trinity Broadcasting
22 Network, that would be a resignation and rehire situation?

23 A Yes.

24 Q Would you say that as a practical matter Trinity
25 Broadcasting Network controlled Trinity Broadcasting of

1 Florida, Trinity Broadcasting of Oklahoma City, and Trinity
2 Broadcasting of Arizona in -- on or about the period 1980?

3 A No, I don't. I don't say that.

4 Q What would you say?

5 A I'd say that when I sat on the board and we made
6 decisions for Trinity Broadcasting of Florida, I considered
7 the, the needs and the, the -- what's best for that particular
8 corporation, period.

9 Q Now, your answer would not change, even though you
10 have viewed Trinity or Arizona, Oklahoma City, and Florida to
11 be owned and operated companies of the network, correct?

12 A Because there are financial strings there, yes.

13 Q Your, your understanding or your view that Arizona,
14 Oklahoma City, and Florida are owned and operated would be
15 based on the financial strings that exist between the network
16 and those three entities?

17 A Yes.

18 Q Would there be any other --

19 A Ties?

20 Q -- ties?

21 A The programming.

22 Q The name?

23 A The name and the programming, yes.

24 Q Commonality of --

25 A Commonality of --

1 Q -- directors? Certain functions being performed for
2 those various entities at network -- at the network in --

3 A Yes.

4 Q -- California?

5 A Yes.

6 Q Would there be anything else that you can think of
7 right now?

8 A That would be similar?

9 Q That would be in your thinking in terms of whether or
10 not Arizona, Oklahoma City, and Florida were owned and
11 operated companies of the network.

12 A No, other than the fact that the -- you would have
13 the, the certain commonality of board members.

14 Q And there, there could also be a commonality of
15 officers?

16 A That's true.

17 Q But it would still be your view that Trinity
18 Broadcasting Network would not control Trinity of Arizona,
19 Oklahoma City, or Florida?

20 A It never has in my mind. I don't think of Trinity
21 Broadcasting Network when I make decisions for Trinity of
22 Florida.

23 Q Now, considering those factors that you have
24 mentioned which cause you to view Arizona, Oklahoma City, and
25 Florida as owned and operated companies of Trinity

1 Broadcasting Network, what if anything was different about
2 Translator TV, Inc., when it was formed in 1980 that would,
3 that would cause you to view Translator TV, Inc., as anything
4 other than an owned and operated company of Trinity
5 Broadcasting Network?

6 A The -- Well, the same factors in terms of control
7 that I mentioned earlier I think would apply to Translator TV.
8 That's the way that I view it, that the directors of that
9 corporation were going to exercise independent, independent
10 discretion and make up their own minds about the decisions of
11 that corporation, and I've seen them do it. I've been in
12 board meetings where they have exercised very independent
13 discretion. That corporation also, from the beginning, had a,
14 a minority involvement in terms of the, the original two board
15 members, Jane and Mr. Espinoza.

16 And I could elaborate on that, but I think what they
17 brought to the corporation, what Aguilar brought to the
18 corporation, what Dr. Ellis brought to the corporation is
19 different than what Paul and Jan Crouch and myself bring to
20 Trinity Broadcasting Network.

21 Q The focus of my question, though, is not on what may
22 be the case now or what may have been the case in 1990 when
23 Phil Aguilar was brought on the board. The focus of my
24 question is back in 1980.

25 A Yes.

1 Q Translator TV, Inc., is being formed. The directors
2 for Translator TV, Inc., are Paul Crouch, Jane Duff and
3 Philip David Espinoza. Now, Paul Crouch and Jane Duff at this
4 time are directors of Trinity Broadcasting Network?

5 A Yes.

6 Q They are also directors of Trinity Broadcasting of
7 Florida?

8 A That's correct.

9 Q So in 1980, why wouldn't Translator TV, Inc., be just
10 as much an owned and operated company of Trinity Broadcasting
11 Network as Trinity of Arizona, Trinity of Oklahoma City, and
12 Trinity of Florida?

13 A Because it was always -- something unique, both in
14 terms of what its, its purpose was and its, its board of
15 directors.

16 Q Now, wasn't Trinity Broadcasting -- Or, excuse me,
17 wasn't Translator TV, Inc.'s, goal to provide an outlet for
18 Trinity Broadcasting Network programming through translators
19 that would be acquired across the country?

20 A That, that was, that was the goal, yes. I wouldn't
21 say that it was its only goal.

22 Q What were its other goals?

23 A It, it definitely was, was established to be of
24 assistance to minorities. And if I could state the --

25 Q I was going to ask you how.

1 A Okay. The -- Let me just state part of the mindset
2 here. I think there was a, a hesitancy to really blow the
3 horn and say this is the minority corporation in the sense
4 that it might be demeaning in a way to, to the board members
5 to say we're going to trade you -- train you and mentor you in
6 minority. In the operation of companies, that was one of the,
7 the goals. That was not, not particularly set forth, but it
8 was an understanding. The other factor that comes to my mind
9 and that I, that I have seen -- I can't tell you that I saw
10 this at the beginning because nothing happened for seven
11 years.

12 To my knowledge, we were waiting for some rules to be
13 made certain at the FCC. So there really wasn't any
14 opportunity until '87, thereabouts, for this corporation to
15 begin to flex its muscles and show what its -- what it was
16 designed to do.

17 Q Well, we'll probably get into that as we go along.

18 JUDGE CHACHKIN: I don't think you got an answer to
19 your question. How has it been of assistance to minorities up
20 to the present time?

21 MR. JUGGERT: Up to the present, up to the present
22 time, the assistance that I'm aware of is -- has been through
23 the Portland station and --

24 JUDGE CHACHKIN: What assistance to minorities has it
25 rendered?

1 MR. JUGGERT: I understand that it employs a great
2 number of minorities, has minority programs. It has programs
3 of assistance to minorities in the Portland area.
4 Furthermore, I think that, that what is important about the
5 station is is that -- about that corporation is that it, it
6 has provided experience in the operation of a television
7 broadcasting company to several minorities.

8 JUDGE CHACHKIN: But it's required by the FCC to have
9 minority employment, isn't it?

10 MR. JUGGERT: Depending upon the area, yes, that's
11 true.

12 JUDGE CHACHKIN: Not depending upon the area. It is
13 required to have minority employment.

14 MR. JUGGERT: Yes, sir, it would be a requirement.

15 JUDGE CHACHKIN: How has it been of assistance to
16 minorities?

17 MR. JUGGERT: Well, look at the board of directors.
18 And I think that they have -- that there has been a
19 substantial training that has gone on through their
20 corporation to the minorities.

21 JUDGE CHACHKIN: How has -- I don't understand about
22 the board of directors. Ms. Duff was a director of TBN.
23 Ms. Duff was -- has been heavily involved in TBN, so what,
24 what assistance to minorities -- What do you mean by
25 directors?

1 MR. JUGGERT: Well, let's use Mrs. Duff as an
2 example. And this is something I have personal knowledge of.
3 Mrs. Duff calls the, the shots on a day-to-day basis for
4 National Minority. I'm personally aware of that. Mrs., Mrs.
5 Duff -- My contacts, when they've been with National Minority,
6 have been with Mrs. Duff. She makes the decisions. She has
7 an independence at, at National Minority that none of the
8 station managers for the Trinity Broadcasting corporations
9 have. She's here in the audience today. I don't know of any
10 station manager that on their own decision can say I'm going
11 to fly off to Washington to listen to some hearings.

12 Jane Duff has that type of, type of, type of
13 authority, and it transfers over into the business decisions
14 and the, the hiring policies and the programming to, to all of
15 the, the, the aspects of, of National Minority --

16 JUDGE CHACHKIN: She's not a station manager of any
17 of those stations held by National Minority.

18 MR. JUGGERT: No, she's in a higher position than
19 that. She is a person that exercises authority as a manager.

20 JUDGE CHACHKIN: She's also intimately involved with
21 the workings of TBN, is she not?

22 MR. JUGGERT: She is intimately involved with, with
23 TBN and, and National Minority.

24 JUDGE CHACHKIN: That's correct. Go ahead, Counsel.

25 BY MR. SHOOK:

1 Q What I wanted to do is, is bring you back to 1980.
2 At this point, we have Translator TV, Inc., being formed and
3 you have explained some of the goals for Translator TV, Inc.
4 In terms of minority involvement, I think that's -- if I'm
5 using the terms you did, you know, that's what I'd like to
6 use. Wasn't the minority involvement, specifically focusing
7 on Jane Duff now, greater for her relative to her role in
8 Trinity Broadcasting Network and Trinity Broadcasting of
9 Florida than it was in Translator TV, Inc.?

10 A That would, that would undoubtedly be true up until
11 '87. She was more directly involved in those corporations up
12 until that time because National Minority really wasn't doing
13 anything.

14 Q And so long as she was a director of Trinity, Trinity
15 Broadcasting Network and Trinity Broadcasting of Florida, she
16 had the ownership interest in those entities. That was your
17 understanding, correct?

18 A Yeah. And I don't purport to know what that means in
19 FCC terms, yes. But it was -- As I understand, directors are
20 like owners of a stock corporation.

21 Q Well, for purposes of Trinity Broadcasting Network,
22 that's a California corporation, if Mrs. Duff is a director
23 California law would view her as one of the owners, would it
24 not?

25 A I've never heard that phrase used. I think that's an